

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 KEVIN RUBINO (CABN 255677)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7291
8 FAX: (415) 436-7234
Kevin.Rubino@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. 19-CR-0225-RS
)	
14 Plaintiff,)	STIPULATION AND ORDER
)	
15 v.)	
)	
16 CHAD ERIC SUNDERLAND,)	
)	
17 Defendant.)	
)	

18
19 Pursuant to Criminal Local Rule 32-2, the parties provide this stipulation to the Court to jointly
20 request a change in the date for the sentencing hearing from April 21, 2020 to May 5, 2020.

21 There is good cause for this change. As the Court noted in General Order No. 72, to curb the
22 rapid spread of coronavirus, the six Bay Area counties have announced a shelter in place order directing
23 everyone to stay inside their homes and away from others as much as possible for the next three weeks.
24 This shelter-in-place order, as well as related precautions taken by the Santa Rita Jail, where the
25 Defendant is housed, may limit the ability of defense counsel to meet with her client. If the sentencing
26 hearing were to remain unchanged, these restrictions could interfere with defense counsel's ability to
27 respond to the proposed presentence report on the timeline required by Criminal Local Rule 32-4(b).
28 Finally, because the case is post-plea, the Speedy Trial Act is not implicated.

1 The parties have conferred with the Probation Officer who has confirmed that he is available on
2 May 5 for a rescheduled sentencing hearing.

3 The parties have also conferred with the Courtroom Deputy Clerk who has confirmed that May 5
4 is available on the Court's calendar.

5 IT IS SO STIPULATED.

6
7 DATED: March 20, 2020

/s/ Kevin Rubino
KEVIN RUBINO
Assistant United States Attorney

8
9
10 DATED: March 20, 2020


/s/ Ann McGlenon
ANN MCGLENON
Counsel for Defendant
Chad Eric Sunderland

11
12
13
14
15 **ORDER**

16 For the reasons stated above, the Court CONTINUES the sentencing hearing currently scheduled
17 for April 21, 2020 at 2:30 p.m. to May 5, 2020 at 2:30 p.m.

18
19 IT IS SO ORDERED.

20
21 DATED: 3/20/2020


HONORABLE RICHARD SEEBORG
United States District Court Judge